UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

)	
UNITED STATES OF AMERICA)	
)	
V.) (CR. NO. 14-CR-00073-PE
)	
LOIS PATTON)	
)	
	_)	

DEFENDANT'S ASSENTED TO MOTION TO CONTINUE

The defendant requests that this Court issue an Order continuing the trial in this case from the two week period beginning August 5, 2014 for at least 90 days. Grounds follow:

The defendant has been charged with Conspiracy to commit Wire Fraud, multiple counts of Wire Fraud, Attempted Access Device Fraud, Access Device Fraud, and Aggravated Identity Theft. Her co-defendant, Laura Minot, is represented by Theodore Lothstein.

The trial is scheduled for the two week period beginning August 5, 2014. This is the first scheduled trial date.

Counsel received initial discovery on Friday, July 11, 2014, and supplemental discovery on Monday July 14, 2014. In addition to several thousand pages of written documents there are discs containing video recordings of various alleged transactions. Counsel will need significant time to review and evaluate this material.

AUSA William Morse has no objection to this motion.

Attorney Theodore Lothstein has no objection to this motion.

No memorandum of law is necessary to the resolution of the issues raised herein.

The defendant agrees to waive her right to speedy trial with respect to any delay caused by the granting of this motion. A fully executed waiver will be forthcoming under a separate heading.

WHEREFORE the defendant requests that this Court issue an Order continuing the trial in this case from the two week period beginning August 5, 2014 for at least 90 days.

Respectfully submitted, Lois Patton By Her Attorney,

Date: July 17, 2014 /s/ Jonathan R. Saxe

Jonathan R. Saxe N.H. Bar No. 8226 Assistant Federal Defender Federal Defender Office 22 Bridge Street Concord, NH 03301 Tel. (603) 226-7360

E-mail: jonathan saxe@fd.org

CERTIFICATE OF SERVICE

I hereby certify that the above document was served on the following person on July 17, 2014 and in the manner specified herein: electronically served through ECF to AUSA William Morse and Theodore Lothstein.

/s/ Jonathan R. Saxe
Jonathan R. Saxe

N.H. Bar No. 8226 Assistant Federal Defender Federal Defender Office 22 Bridge Street Concord, NH 03301 Tel. (603) 226-7360

E-mail: jonathan saxe@fd.org